

EXHIBIT A

Emails regarding Proposed Order

RE: [npap-wellpath] Moving forward after the stay

From: Lee, Catherine <clee@mwe.com>

Thu, May 22, 2025 at 9:59 AM CDT (GMT-05:00)

To: R. J. Shannon <rshannon@shannonleellp.com>; Kapp III, James <JKapp@mwe.com>; <zachary.hemenway@stinson.com>; Hemenway, Zachary H. <zachary.hemenway@stinson.com>

Thanks, RJ. We are fine with your comments.

@Zach, we've been hearing from the Court this morning. We really need to get these orders on file today. Can you please send any comments you have by 2:00 pm CT?

CATHERINE LEE

Associate

McDermott Will & Emery LLP 444 West Lake Street, Suite 4000, Chicago, IL 60606-0029

Tel +1 312 899 7226 **Email** clee@mwe.com

Website | **vCard** | **LinkedIn**

From: R. J. Shannon <rshannon@shannonleellp.com>

Sent: Wednesday, May 21, 2025 9:33 PM

To: Lee, Catherine <clee@mwe.com>; Kapp III, James <JKapp@mwe.com>; zachary.hemenway@stinson.com

Subject: RE: [npap-wellpath] Moving forward after the stay

[External Email]

All,

See the attached with some comments. They are:

Paragraph 4—I think Kapp is right about the Trust being the nominal party, but it is very confusing, and it seems like many courts get this wrong. I think the attached clarifies the issue while still using the term correctly.

New Paragraph 5—This is the main issue I've been seeing from my guys.

Thanks,

R. J.

--

R. J. Shannon

Partner

Shannon & Lee LLP

Direct: (346) 535-0515

Cell: (512) 693-9294

rshannon@shannonleellp.com

From: Lee, Catherine <clee@mwe.com>

Sent: Wednesday, May 21, 2025 1:26 PM

To: R. J. Shannon <rshannon@shannonleellp.com>; Kapp III, James <JKapp@mwe.com>; zachary.hemenway@stinson.com

Subject: RE: [npap-wellpath] Moving forward after the stay

RJ,

Attached please find the draft order, subject to ongoing review. We believe this covers the concerns outlined

Thanks,

CATHERINE LEE
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From: Lee, Catherine
Sent: Wednesday, May 21, 2025 12:39 PM
To: R. J. Shannon <rshannon@shannonleellp.com>; Kapp III, James <JKapp@mwe.com>; zachary.hemenway@stinson.com
Subject: RE: [npap-wellpath] Moving forward after the stay

The draft is in process. We will share it when it is ready.

CATHERINE LEE
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From: R. J. Shannon <rshannon@shannonleellp.com>
Sent: Wednesday, May 21, 2025 12:36 PM
To: Kapp III, James <JKapp@mwe.com>; Lee, Catherine <clee@mwe.com>; zachary.hemenway@stinson.com
Subject: Fw: [npap-wellpath] Moving forward after the stay

[External Email]

All -- Would you mind sending me a copy of the draft stay order? The below is what my guys are running into and want the order to avoid.

R. J. Shannon
Shannon & Lee LLP
512-693-9294

From: Torreya Hamilton <tlh@hamiltonhennessy.com>
Sent: Wednesday, May 21, 2025 12:26 PM
To: R. J. Shannon <rshannon@shannonleellp.com>
Cc: Hamilton Torri <tlh@hamiltonhennessy.com>; npap-wellpath@nationallawyersguild.org <npap-wellpath@nationallawyersguild.org>
Subject: Re: [npap-wellpath] Moving forward after the stay

RJ— we appeared this morning and the Wellpath attorney told the Court that we cannot proceed against Wellpath but have to go through BK court. He also told our judge that Wellpath has not decided if it is going to indemnify its employees.

We — all of us— need a very clear order from This BK judge that we can all take to our judges that all of us can understand. It needs also to specify what exactly we can proceed against Wellpath for—and what it means to be a nominal defendant.

Sincerely,

Torreya L. Hamilton

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